

PRIVACY POLICY

Effective Date: 23 February 2020

This Privacy Policy sets forth our standards for protection and security of personal and other data collected from visitors and users of the website <https://www.consulting24.co> (the “Website”). The Website is owned and operated by Heaven Invest OÜ, having its legal address at Rävåla puistee 19, Tallinn, 1043, Estonia. The company operates under the brand name of “Consulting24” which is used throughout the Privacy Policy to refer to the owner and operator of the Website.

This Privacy Policy is the integral part of the Terms and Conditions (“Terms”). All capitalized terms used in the Terms shall apply to this Privacy Policy with the same meanings as in the Terms.

By using our Services (as defined in the Terms), you agree to this Privacy Policy in its entirety. You should not use our Services, if you do not agree to this Privacy Policy, our Terms and other guidelines that govern the use of our Services. This Privacy Policy does not control or apply to the practices of third parties that we do not own, manage or control.

1. Definition of Personal Data

Throughout this Privacy Policy, we refer to your “personal data” which is any data concerning an identified or identifiable natural person, regardless of the form or format in which such data exists, as provided by the Estonian Personal Data Protection Act.

2. Collection of your Personal Data

We collect your personal data through different ways depending on how you use the Services. Here are a few examples on how we collect your personal data. We collect your personal data you provide us with, including, without limitation, when you:

- visit, browse, and use our Website;
- contact us with any enquiries and in relation to the Services that we provide;
- provide full name, passport details, address and other requested information during identity verification;
- subscribe to our newsletters;
- interact with us on our social media pages;
- communicate with our partners and vendors selling our Services;
- send us an email with personal data;
- order any Service of Consulting24;
- communicate with us, our staff through the Website, via email or phone;
- voluntarily submit your personal data to Consulting24 for any reason.

Consulting24 may receive the following personal data:

- information provided by the user during identity verification, including, user name, full name, passport data, phone number, date of birth, postal address and email address;
- your ID/passport and details containing in these documents, proof of address;
- financial information when you pay for our Services, including, without limitation, credit card number, bank account details, etc;
- contact details when you fill in our contact form, including, without limitation, skype account name, whatsapp number, email;
- information that you provide to Consulting24 when Consulting24 reasonably requests in order to provide you with consulting and other services;
- any other personal data which you directly provide to Consulting24.

By submitting the data, you confirm that you have the right to authorise us to process it on your behalf in accordance with this Privacy Policy.

Our Website can be visited anonymously. The Website processes anonymous metadata through cookies such as the URL of the requested file, the amount of data transferred, the date and time of the request from the user, Internet browser information, operating system type, the IP address of the used device, the Internet service provider, reference links such as user clicks on certain links. This metadata cannot be used by the Website to obtain personally identifiable information. This information is only used for general purposes, such as technical improvements, statistical and marketing analysis.

When you visit our Website and use our Services, we may automatically receive some information that identifies, for each page accessed:

- the type of browser and operating system you have used;
- the IP (Internet Protocol) address of the device which has accessed it (example PC, tablet);
- the date and time of your visit to the Website;
- the pages accessed and documents downloaded;
- your top-level domain name (for example .com, .io, .eu, etc.);
- the address of your server;
- the previous website visited;
- the average duration of page view;
- the navigation behaviour and preferences of the user.

We may use cookies to optimize navigation and to improve our Services. You may use the settings within your browser to control cookies or prevent accepting some or all cookies. To find out more useful information on how to block cookies using different browsers, please visit www.allaboutcookies.org. You can block or delete all or some cookies. However, blocking or deleting cookies may limit your use of full advantages of our Website.

- Google Analytics

We do not disclose any information received with the use of cookies except for our service providers. Thus, we may use certain third party services, such as Google Analytics that helps us to analyse usability and user experience. You authorize Consulting24 and its service providers to perform analytics on such data that do not personally identify you, to (i) improve, enhance, support and operate the Website and Services; and (ii) collect statistical data and prepare statistical reports.

Legal basis

Consulting24 collects and processes personal data about users and customers only if Consulting24 has lawful basis. Lawful basis includes:

- consent (where you have given consent);
- contractual obligations (when the processing is necessary to perform our obligations under a contract);
- legitimate interests;
- compliance with applicable law (when we follow applicable personal data law in order to be complied with).

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object.

The legitimate interests are:

- analysing and understanding your behaviour on the Website;
- providing you with the Services related to company incorporation, obtaining licenses or other permits, other services as we mutually agreed on;
- conducting an identity verification in accordance with anti-money laundering legislation (if applicable);
- making improvements to the Services;
- enabling us to enhance, customise or modify our Services and communications;
- improving data security;
- representing you before legal, financial and regulatory authorities if you directly instructed us (e.g. in case of company incorporation, opening a bank account, obtaining licenses);
- determining whether marketing campaigns are effective.

If you have any questions about the lawful basis upon which we collect and use your personal data, please contact us at info@consulting24.co.

Minors

Consulting24 does not knowingly provide Services and collect personal information from anyone under 18 years of age. Our Services are available only to the users over 18 years old. If we learn that we have

collected the personal information of a child under 13, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

Sharing your Personal Data

Consulting24 may share your information with:

- service providers we work with to deliver some Services;
- legal and regulatory authorities, as required by applicable laws and regulations;
- legal, financial and regulatory authorities if you directly instructed us to provide you with the Services;
- our employees;
- our auditors, lawyers, accountants, consultants and other professional advisors, where it is reasonably necessary for obtaining advice, professional services, or managing legal disputes.

We will not disclose, sell, trade, or otherwise transfer your personal data to any third parties without your consent or unless otherwise stated in this Privacy Policy.

This Privacy Policy does not apply to the practices of service providers and other third parties that we do not own or control, or individuals that we do not employ or manage.

Sensitive Data

We do not collect or request your sensitive data (including, but not limited to, information about your religious or political beliefs, opinions). Where you have provided it to us voluntarily, you shall be solely responsible for security of any sensitive data, and we do not intend to use this data for any purpose, nor share this data with any third parties. Please do not post or add sensitive and other personal data that you would not want to be publicly available.

Use of Personal Data

Personal data will be collected, held, used and disclosed for the following purposes jointly and/or severally:

- for the purposes for which it was collected (as set out in this Privacy Policy);
- to provide you with Website and Services requested;
- to identify you;
- to verify your identity;
- to communicate with you as described in this Privacy Policy;
- to provide you with newsletters you subscribed to;
- to process any requests;
- to perform marketing analysis and to conduct market research;

- to the extent permissible or necessary by law, for any other purpose as may be deemed reasonably necessary by Consulting24 in the circumstances;
- to perform other activities as described in the Privacy Policy.

Users' Rights in relation to its Personal Data

You may access your personal data held by us to correct, update and remove inaccurate or incorrect data.

You have the following rights:

- delete some or all personal data that we held about you;
- change or correct your personal data that we held about you;
- object to, or limit or restrict, use of your personal data;
- right to access and/or take your personal data: you can ask us for a copy of your personal information in machine readable form;
- ask not to use your personal data for marketing purposes;
- access information we hold about you.

If you want your personal data to be corrected, updated or removed, please contact us at info@consulting24.co.

Security of Personal Data

We use certain technologies to ensure the confidentiality of your personal data. While we strive to use commercially acceptable means to protect your personal data, no method of transmission over the Internet, or method of electronic storage, is completely secure, and we cannot guarantee absolute security of your personal data.

Data Transfer and Retention

We retain your personal data primarily in Estonia. We may retain your personal data in other countries of the European Union.

Countries where we process information may have laws which are different, and potentially not as protective, as the laws of your own country, though we will always comply with the applicable laws in doing so.

We retain your personal data for as long as we need it to fulfil the purposes for which we originally collect it or as needed to provide you with the services, except if required otherwise by law.

In some cases we may determine the period of data retention based on the period we need to access the data for the provision of services, receiving payment, resolving your customer support issues or for any other auditing or legal purposes.

Retention periods may be changed from time to time based on regulatory requirements.

Merge of Company

If Consulting24 merges with, or is acquired by, another company or organisation, or sells all or a portion of its assets, your personal data may be disclosed to our advisers and any prospective purchaser or any prospective purchaser's adviser, and may be among the assets transferred. However, personal data will always remain subject to this Privacy Policy.

Changes to the Privacy Policy

We may change this Privacy Policy from time to time. As soon as the Privacy Policy is updated, Consulting24 will post an updated version of the Privacy Policy on the Website. The new Privacy Policy becomes effective from the moment it is posted or updated on our Website. We will send you an email notification to alert you about such changes.

Contact Us

If you have any questions in relation to our Privacy Policy, please contact us at info@consulting24.co.